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IN THE UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

GUSTAVO RAMOS,

Plaintiff,

vs.

CLARK COUNTY DETENTION CENTER, (an
operating agency of Clark County NV),
NAPHCARE, INC. (a foreign corporation),
UNKNOWN MEDICAL SERVICES PROVIDER
(Corp Roe #1), WARDEN OF CCDC (John
Doe #1), in its individual and professional
capacity, SHERIFF JOSEPH LOMBARDO,
LAS VEGAS METROPOLITAN POLICE
DEPARTMENT, in his individual and
professional capacity, YOLAND KING, in her
individual and professional capacity, (Clark
County Manager), JEFF WELLS, in his
individual and professional capacity (Asst
Clark County Manager), LT. MICHAEL
LUSCH (Lusch or Lt. Lusch) in his individual
or professional capacity as a supervisor at
CCDC, DOES 1-X, ROES 1-X, et al.,

Defendants.

No. 2:19-CV-00124-RFB-VCF

~~PROPOSED~~ STIPULATION TO
EXTEND DISCOVERY DEADLINES
(First Request)

This is the first stipulation to extend the time to complete discovery. In light of the current restrictions due to the COVID-19 pandemic, the parties have been unable to complete discovery in the time frame initially anticipated. For example,

the parties have been unable to complete plaintiff's deposition because effective March 7, 2020, the State of Nevada Department of Corrections has temporarily suspended visitation of all inmates, including attorney/legal visits. Accordingly, the parties hereby stipulate to extend all discovery deadlines six months.

The current discovery deadlines are as follows:

Amend Pleadings:	June 16, 2020
Initial Expert Disclosures:	June 17, 2020
Rebuttal Expert Disclosures:	August 17, 2020
Close of Discovery:	September 14, 2020
Dispositive Motions:	October 14, 2020

The parties hereby propose the following new discovery deadlines:

Amend Pleadings:	December 16, 2020
Initial Expert Disclosures:	December 17, 2020
Rebuttal Expert Disclosures:	February 17, 2021
Close of Discovery:	March 14, 2021
Dispositive Motions:	April 14, 2021

Dated: May 14, 2020

Dated: May 14, 2020

SCHUERING ZIMMERMAN & DOYLE,
LLP

THE MARKOWITZ LAW FIRM

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Dated: May 14, 2020

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By: /s/ Robert W. Freeman

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Dated: May 14, 2020

OLSON, CANNON, GORMLEY &
STOBERSKI

By: 

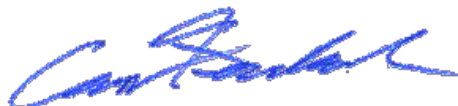
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KING and JEFF WELLS*

ORDER

Based on the foregoing, it is hereby ORDERED, ADJUDGED AND DECREED
that the proposed discovery deadlines set forth above are hereby approved and
adopted.

IT IS SO ORDERED.

DATED this 15th day of May, 2020.


UNITED STATES DISTRICT JUDGE
Magistrate